



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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86 Chambers Street  
New York, New York 10007

June 30, 2021

**By ECF**

Honorable Valerie E. Caproni  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *National Audubon Society, et al. v. U.S. Department of the Interior, et al.*,  
18 Civ. 4601 (VEC)

Dear Judge Caproni:

This Office represents Defendants in the above-referenced matter. Pursuant to the Court's endorsed order dated June 1, 2021 [ECF No. 100], we write respectfully to request an additional 30-day stay of the EAJA fee motion filed by plaintiffs American Bird Conservancy, Center for Biological Diversity, and Defenders of Wildlife ("Moving Plaintiffs") on April 1, 2021 [ECF No. 96]. Since the Court's June 1, 2021 order, the parties have continued their discussions and Defendants have taken steps in furtherance of obtaining settlement authorization. This is Defendants' second request for a further stay of the Moving Plaintiffs' EAJA fee motion. Eric Glitzenstein, Esq., counsel for the Moving Plaintiffs, has consented to this request.

We thank the Court for its consideration of this request.

Respectfully submitted,

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cc: All counsel of record via ECF